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June 10, 1982

MODO94391810 MODOGO 822585

Mr. Gerald C. Lamotte III Technical Representative, Chemical Department Brown Shoe Company Post Office Box 354 St. Louis, MO 63166

RCRA RECORDS CENTER

Dear Mr. Lamotte:

This is in reference to your letter of April 7, 1982, to Mr. David Bedan concerning the management of "hazardous waste" by Brown Shoe Company.

In response to your request the department has deleted the Brown Shoe Company facility at 3305 Chouteau Avenue, Missouri Generator I.D. #02990, from the files. In order to have the EPA #MOD929189017 corrected you will need to contact Betti Harris at the EPA, Region VII, office, 324 E. 11th Street, Kansas City, Missouri 64106, telephone #816-374-6533.

The transporter license, number H-1045, issued to the site at 4327 Gustine in St. Louis is not transferrable. The location at Benton, Missouri, will need to reapply for a transporter license. If there are questions concerning the transporter license contact Mary Ann Redden at this office, telephone number 314-751-3241.

The plan you have for transferring waste at Benton from Ironton, Steelville, Union and the 20 small generator sites is acceptable if the following conditions are met in addition to those described by you:

- Total trailer storage and transportation time shall not exceed 7 days -(10 CSR 25-6.010(2)(F)).
- 2. A transporter licensed by the department shall be utilized to carry hazardous waste - 260.380.1(5), RSMo (1980). (This includes waste from the "20 small quantity generators" when the transporter has exceed 100 Kg).
- The Ironton, Steelville and Union Plants shall initiate the manifest document for waste shipped from these respective plant sites - (10 CSR 25-5.010(4)(C)) and shall comply with all applicable manifest provisions in 10 CSR 25-5.010(4), and the procedures for the transfer of waste between transporters in 10 CSR 25-6.010(2)(B)2.B.
- A manifest shall be initiated at the Benton site for all the wastes collected from the small quantity generators. The small quantity generators are exempt from manifesting but the Benton site is acting as a generator.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241 1915 Southridge Drive

> Christopher S. Bond Governor Fred A. Lafser Director

Division of Environmental Quality Robert J. Schreiber Jr., P.E. Director

- 5. The Missouri or Illinois manifest may be used. Since Illinois EPA will not accept Missouri's manifest you may choose to use the Illinois manifest with the following additions: write in the margin the Missouri Generator I.D. #, the Missouri waste I.D. number, and the Missouri Hazardous Waste Transporter license number.
- 6. Arrange for the waste facility to return appropriate copies of the completed manifest back to you.
- Send a copy of the completed manifest to the department on a calendar quarter basis.

If there are further questions on the above, please feel free to contact Joe Davis at 314-751-3241.

Sincerely,

Carol R. Eighmey

Chief, Planning and Management Section Waste Management Program

CRE/KJD/jas

cc: Betti Harris, EPA Region VII
Mike Duvall, St. Louis Regional Office
Joe Dayis, Waste Management Program